

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

DONALD J. TRUMP,

Plaintiff,

v.

MICHAEL D. COHEN,

Defendant.

Case No. 23-cv-21377-DPG

**DEFENDANT’S MOTION FOR ENTRY OF ORDER ON
DISCOVERY MATTERS RAISED DURING THE SEPTEMBER 28, 2023 HEARING**

Defendant Michael D. Cohen, pursuant to this Court’s Order Setting Discovery Procedures [D.E. 35], hereby moves the Court to enter the attached order reflecting the Court’s rulings during the September 28, 2023 hearing upon Defendant’s Amended Motion for Hearing. [D.E. 64] The Proposed Order on Discovery Matters Raised During the September 28, 2023 Hearing is attached hereto as **Exhibit 1**.

Defendant respectfully requests that this Court enter the Proposed Order on Discovery Matters Raised during the September 28, 2023 Hearing and grant such other and further relief as this Court deems just.

Respectfully submitted,

By: /s/ Max Eichenblatt
Benjamin H. Brodsky
Florida Bar No. 73748
Max A. Eichenblatt
Florida Bar No. 1025141
BRODSKY FOTIU-WOJTOWICZ, PLLC
200 SE 1st Street, Suite 400
Miami, Florida 33131
Tel: 305-503-5054
Fax: 786-749-7644
bbrodsky@bfwlegal.com
docketing@bfwlegal.com

E. Danya Perry
New York Bar No. 2839983
(admitted *pro hac vice*)
E. DANYA PERRY PLLC
157 East 86th Street, 4th Floor
New York, NY 10028
Tel: 646-349-7550
dperry@danyaperryllaw.com

Lilian M. Timmermann
Florida Bar No.1033260
E. DANYA PERRY PLLC
700 S. Rosemary St., Suite 204
West Palm Beach, FL 33401
Tel: (646) 357-9953
Fax: (646) 849-9609
ltimmermann@danyaperryllaw.com

Counsel for Defendant Michael D. Cohen

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this September 29, 2023, a copy of this filing was submitted electronically via the CM/ECF system to all parties that have entered an appearance in this case and on the Court's electronic system.

By: /s/ Max Eichenblatt
Max A. Eichenblatt